

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,
Plaintiff,

Criminal Number 05-10085RCL

V.

HANA AL-JADER,
Defendant

MOTION TO DISCHARGE MORTGAGE
AND TO VACATE LIS PENDENS

Now comes the defendant, Hana Al-Jader, and surety Amar Chamo, in the above captioned matter and respectfully request this Honorable Court vacate the recorded Lis Pendens and order the Clerk for the United States of America for the District of Massachusetts to discharge the recorded mortgage on 62 Cambridge Street, Winchester, Massachusetts. In support thereof, counsel for Hana Al Jader states the following:

- 1) On April 1, 2005 an appearance bond in the amount of One Million (\$1,000,000.00) Dollars was ordered by this Court.
- 2) On April 1, 2005, Hana Al Jader and Amar Chamo executed an Agreement to Forfeit the property located at 62 Cambridge Street, Winchester, Massachusetts.
- 3) On or about April 1, 2005 mortgages, quitclaim deeds, escrow agreements and accompanying documents on the property were entered in this case to the favor of the Clerk of the United States District Court, District of Massachusetts in the amount of One Million (\$1,000,000.00) Dollars.

4. On April 5, 2005, a mortgage to the benefit of the Clerk of the United States District Court was recorded and the Middlesex South Registry of Deeds

5. On May 4, 2005 a Lis Pendens was recorded at the Middlesex South Registry of Deeds.

6. On September 5, 2006, Hana Al Jader pleaded guilty.

7. On September 21, 2006 Hana Al Jader was sentenced.

Therefore, the defendant and surety requests that the mortgage on the property located at 62 Cambridge Street, Winchester, Massachusetts be discharged and Lis Pendens be vacated.

Respectfully Submitted,
By her counsel,

//Joseph J. Balliro, Jr.//
Joseph J. Balliro, Jr.
Balliro & Mondano
99 Summer Street
Suite 1800
Boston, Massachusetts 02110
(617) 737-8442
BBO#550194

CERTIFICATE OF SERVICE

I, Joseph J. Balliro, Jr., hereby certify that I have caused a true copy of the foregoing document to be served electronically upon all counsel of record and to the Clerk of the Criminal Court, United States Courthouse, 1 Courthouse Way, Boston, MA 02110, this 2nd day of January, 2007.

//Joseph J Balliro, Jr.//
Joseph J. Balliro, Jr.

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DISCHARGE OF MORTGAGE

Sarah A. Thornton, Clerk of the United States District Court, District of
Massachusetts, holder of a mortgage dated April 1, 2006 from Hana Al Jader and Amar
Chamo to the Clerk of the United States District Court, for the property known as 62
Cambridge Street, Winchester, Massachusetts and recorded at the Middlesex South Registry
of Deeds on April 5, 2005 at Book 44947 Page 190, acknowledges satisfaction of same.

Sarah A. Thorton, Clerk

COMMONWEALTH OF MASSACHUSETTS

Boston, Massachusetts

January ____, 2007

Then personally appeared before me, the above named Sarah A. Thorton, Clerk of the
United States District Court, and acknowledged the foregoing to be her free act and deed.

Notary Public

My Commission Expires: _____